

The Honorable Lauren King
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; AMAZON.COM SERVICES LLC,
a Delaware limited liability company; and THE
THOUGHT & EXPRESSION CO., INC., a
Virginia corporation,

Plaintiffs,

v.

AMANDEEP SINGH, an individual; and
BHUSHAN KUMAR, an individual; and DOES
1-10,

Defendants.

No. 2:24-cv-01464-LK-BAT

**PLAINTIFFS' *EX PARTE* MOTION
TO FILE OVER-LENGTH *EX PARTE*
MOTION FOR ALTERNATIVE
SERVICE**

WITHOUT ORAL ARGUMENT

NOTE ON MOTION CALENDAR:
OCTOBER 23, 2024

Pursuant to Local Civil Rule 7(f), Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and The Thought & Expression Co. d/b/a Thought Catalog (collectively, "Plaintiffs") request that the Court permit them to file an over-length *ex parte* motion in support of their request for an order from this Court allowing for alternative service of process on Defendants. Local Civil Rule 7(e)(1) provides that motions brought pursuant to Local Civil Rule 7(d)(1), including *ex parte* motions, are limited to 2,100 words. By this request, Plaintiffs seek to file a motion containing approximately 1,600 additional words, for a total limit of 3,700 words.

Plaintiffs contend that the additional words are necessary to provide sufficient explanation of the facts surrounding Plaintiffs' investigation into Defendants' identities and

1 whereabouts, as well as the law dictating the circumstances in which this Court may allow for
2 alternative service. This matter includes two Defendants, each of whom has gone to great lengths
3 to conceal their identities and locations, thereby requiring diligent investigation by Plaintiffs.
4 These investigations involved Plaintiffs, their counsel, and a private investigator, as well as
5 searches of both public information and specialized databases. Thus, the 2,100 word limit is
6 insufficient for Plaintiffs to provide this Court with the facts and authorities supporting the
7 motion and to demonstrate Plaintiffs' need for an order allowing for alternative service of
8 process on Defendants. For these reasons, Plaintiffs seek permission to file an over-length
9 motion to provide this Court with the full details necessary to support the order they seek.

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11 DATED this 23rd day of October, 2024.

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13 *I certify that this memorandum contains 248 words, in compliance with the Local Civil*
14 *Rules.*

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